



February 6, 2012

Ex Parte Notice

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing an Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45

Dear Ms. Dortch:

On Friday, February 3, 2012, the undersigned, on behalf of the National Telecommunications Cooperative Association (“NTCA”), spoke separately via telephone with: (1) Michael Steffen, Legal Advisor to Chairman Julius Genachowski; and (2) Rebekah Goodheart of the Wireline Competition Bureau to discuss implementation of intercarrier compensation (“ICC”) reforms. In each of the separate conversations, NTCA urged the Federal Communications Commission (the “Commission”) to ensure that any ICC rate reforms are implemented in a manner that does not introduce new opportunities for arbitrage through self-classification of traffic and that ensures, consistent with the Chairman’s call for “no flash cuts” in reform, that rate reductions are paired with the availability of a Recovery Mechanism such as that established in the Order.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed via ECFS with your office. If you have any questions, please do not hesitate to contact me at (703) 351-2016 or mromano@ntca.org.

Sincerely,

/s/ Michael R. Romano
Michael R. Romano
Senior Vice President - Policy

cc: Michael Steffen
Rebekah Goodheart

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